

REMARKS

Favorable reconsideration of this application, in light of the preceding amendments and following remarks, is respectfully requested.

Claims 1 and 3-48 are pending in this application. Claims 1 and 32 are amended, claim 2 stands cancelled and claims 22-31, 37-42 and 44-47 stand withdrawn. Claims 1 and 32 are the independent claims.

Applicants note with appreciation the Examiner's indication that the replacement drawings filed January 24, 2008 and the references cited in the Information Disclosure Statement filed November 14, 2007 have been accepted.

ENTRY OF AMENDMENT AFTER FINAL REJECTION

Entry of the Amendment is requested under 37 C.F.R. § 1.116 because the Amendment: a) places the application in condition for allowance for the reasons discussed herein; b) does not present any additional claims without canceling the corresponding number of final rejected claims; and/or c) places the application in better form for an appeal, if an appeal is necessary. Entry of the Amendment is thus respectfully requested.

ALLOWABLE SUBJECT MATTER

Claims 19 and 36 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. However, Applicant respectfully submits that in view of the amendments and remarks contained herein, all of the claims pending in the present application are patentable.

REJECTIONS UNDER 35 U.S.C. § 112

Claims 20-21 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicants respectfully traverse this rejection for the reasons detailed below.

While the Applicants do not necessarily agree with the Examiner, Applicants in the preceding section have deleted the word “substantially” from claims 20-21 in an attempt to expedite the prosecution of the application. Applicants respectfully submit that claims 20-21 are in a condition for allowance for the reasons given above as well as for their dependency on allowed claim 19.

REJECTIONS UNDER 35 U.S.C. § 102

Claims 1, 3-18, 32-35, and 48 stand rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,212,300 (“*Rengakuji*”). Applicants respectfully traverse this rejection for the reasons detailed below.

Claim 1 recites an image processing apparatus for converting image data between a raster scan order and a block scan order, comprising, *inter alia*, an address generating block for converting supplied image data of raster scan order to block scan order by generating a common read/write address for the line memory so that only one line memory is required for performing **simultaneous read and write operations**. (Emphasis Added)

Rengakuji is directed to an image processing apparatus for converting the format of data for specific image data. In column 5, lines 29-32 *Rengakuji* states:-

The access to buffer memory 106 is controlled in units of MCU. When reading out image data of one MCU from buffer memory 106 is finished, it is possible to write the image data of one MCU into buffer memory 106.

(Emphasis Added)

From the above cited language, the Examiner will surely appreciate that the *Rengakuji* apparatus fails to perform "**simultaneous read and write operations**" as required by claim 1. This deficiency of the *Rengakuji* apparatus is further noted in column 5, lines 41-48, wherein *Rengakuji* discloses:-

On the other hand, as shown in FIG. 8, a predetermined interval Ta is provided after writing the image data of the eighth line into buffer memory 106. In this period Ta, it is prohibited to write new data into buffer memory 106. That is, the interval Ta is a period in which the block form image data of one MCU from buffer memory 106 is read out in order to make a free space of buffer memory 106 for writing the raster form image data of the next line for one MCU.

(Emphasis Added)

For the reasons given above, Applicants respectfully submit that *Rengakuji* fails to teach or fairly suggest "generating a common read/write address for the line memory so that only one line memory is required for performing **simultaneous read and write operations**," as required by claim 1.

Absent any such teachings, *Rengakuji* fails to anticipate or render obvious the limitations of independent claim 1 and the somewhat similar features recited in independent claim 32.

Claims 3-18, 33-35, and 48, dependent on one of independent claims 1 and 32, are patentable for the reasons stated above with respect to claims 1 and 32 as well as for their own merits.

Applicants, therefore, respectfully request that the rejection to claims 1, 3-18, 32-35, and 48 under 35 U.S.C. § 102(b) be withdrawn.

CONCLUSION

In view of the above remarks and amendments, the Applicants respectfully submit that each of the pending objections and rejections has been addressed and overcome, placing the present application in condition for allowance. A notice to that effect is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to contact the undersigned.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John A. Castellano at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By

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